

HONORABLE BENJAMIN H. SETTLE

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

AMRISH RAJAGOPALAN, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

NOTEWORLD, LLC,

Defendant.

NO. 3:11-CV-05574

**STIPULATION AND PROPOSED ORDER  
(A) CONSOLIDATING RELATED  
CASES; AND (B) SETTING DEADLINE  
FOR FILING OF CONSOLIDATED  
AMENDED COMPLAINT**

DINAH CANADA, MARIE JOHNSON-  
PEREDO and ROBERT HEWSON on behalf  
of themselves and all others similarly situated,

Plaintiffs,

v.

MERACORD, LLC, *et al.*,

Defendants.

NO. 3:12-CV-05657-BHS

STIPULATION AND PROPOSED ORDER (A)  
CONSOLIDATING RELATED CASES AND (B) SETTING  
DEADLINE FOR FILING OF CONSOLIDATED AMENDED  
COMPLAINT - 1

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Pursuant to Federal Rule of Civil Procedure 42 and Local Rule 42(b), the parties in the above-captioned actions hereby stipulate and agree that (a) the above-captioned actions should be consolidated, and (b) Plaintiffs shall have up to and including August 9, 2013, to file a Consolidated Amended Complaint in the consolidated action.

The parties respectively submit that an extension to the deadline for filing the Consolidated Amended Complaint is necessary, so that the operative pleading in the consolidated action comprehensively reflects the current state of the parties and the issues. The parties are coordinating to submit an agreed schedule for the filing of answer(s) or other responsive pleading(s), further filings in the consolidated actions, and/or mediation shortly after Plaintiffs' filing of the Consolidated Amended Complaint.

A proposed Order follows the parties' signatures.

Respectfully submitted this 13th day of June, 2013.

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s/ Thomas E. Loeser  
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STIPULATION AND PROPOSED ORDER (A)  
 CONSOLIDATING RELATED CASES AND (B) SETTING  
 DEADLINE FOR FILING OF CONSOLIDATED AMENDED  
 COMPLAINT - 2

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*Attorneys for Linda and Charles Remsberg*

**[PROPOSED] ORDER**

IT IS SO ORDERED.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2013.

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BENJAMIN H. SETTLE  
United States District Judge

STIPULATION AND PROPOSED ORDER (A)  
CONSOLIDATING RELATED CASES AND (B) SETTING  
DEADLINE FOR FILING OF CONSOLIDATED AMENDED  
COMPLAINT - 3

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18 (*f/k/a NoteWorld LLC*)

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25 STIPULATION AND PROPOSED ORDER (A)  
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COMPLAINT - 4

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 13, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

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STIPULATION AND PROPOSED ORDER (A)  
CONSOLIDATING RELATED CASES AND (B) SETTING  
DEADLINE FOR FILING OF CONSOLIDATED AMENDED  
COMPLAINT - 5

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